

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

RICHARD MEYER,
Plaintiff

v.

MARK WAID,
Defendant

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Case No. 1:18-cv-00800-LY

**DECLARATION OF RYAN PIERCE IN SUPPORT OF DEFENDANT'S
MOTION TO DISMISS**

I, Ryan Pierce, upon oath, declare as follows:

1. My name is Ryan Pierce. I am over 18 years old, of sound mind, and I am capable of making this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.

2. I am an attorney with the law firm of Reeves and Brightwell LLP. I represent Defendant Mark Waid in the above-referenced proceeding. In that capacity, I am personally familiar with the pleadings on file, the discovery, and other conduct regarding this lawsuit.

3. The documents attached to this declaration are true and correct copies of documents as further detailed below. The Court's Order allowing jurisdictional discovery expressly allows Waid to submit evidence obtained from the discovery as part of his reply. Dkt. #17, ¶ 3.

4. Attached as **Exhibit 1** are true and correct copies of excerpts from the March 6, 2019 deposition of Joeming Dunn.

5. Attached as **Exhibit 2** is a true and correct copy of Deposition Exhibit 25 from the March 6, 2019 deposition of Joeming Dunn. Certain information has been redacted for privacy.

6. Attached as **Exhibit 3** is a true and correct copy of Deposition Exhibit 27 from the March 6, 2019 deposition of Joeming Dunn.

7. Attached as **Exhibit 4** is a true and correct copy of Deposition Exhibit 28 from the March 6, 2019 deposition of Joeming Dunn. Certain information has been redacted for privacy.

8. Attached as **Exhibit 5** is a true and correct copy of Deposition Exhibit 29 from the March 6, 2019 deposition of Joeming Dunn.

9. Attached as **Exhibit 6** is a true and correct copy of Deposition Exhibit 34 from the March 6, 2019 deposition of Joeming Dunn.

10. Attached as **Exhibit 7** is a true and correct copy of Deposition Exhibit 38 from the March 6, 2019 deposition of Joeming Dunn.

11. Attached as **Exhibit 8** is a true and correct copy of Deposition Exhibit 32 from the March 6, 2019 deposition of Joeming Dunn. Certain information has been redacted for privacy.

12. Attached as **Exhibit 9** is a true and correct copy of Deposition Exhibit 39 from the March 6, 2019 deposition of Joeming Dunn.

13. Attached as **Exhibit 10** are true and correct copies of excerpts from the March 6, 2019 deposition of Ben Dunn.

14. Attached as **Exhibit 11** are true and correct copies of excerpts from the February 26, 2019 deposition of Mark Waid.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Travis County, State of Texas, on April 22, 2019.

A handwritten signature in black ink, appearing to be 'RP' with a stylized flourish at the end.

Ryan Pierce